1 Steven A. Alpert, NV Bar #8353 PRICE LAW GROUP, APC 2 5940 S. Rainbow Blvd., Suite 3014 Las Vegas, Nevada 89118 3 Phone: (702) 794-2008 alpert@pricelawgroup.com 4 Attorneys for Plaintiffs, 5 Tiffany and Steven Keith 6 UNITED STATES DISTRICT COURT 7 DISTRICT OF NEVADA 8 TIFFANY KEITH and STEVEN KEITH, Case No.: 2:22-cv-00059-RFB-DJA 9 Plaintiff, PLAINTIFF'S MOTION AND ORDER 10 FOR AN EXTENSION OF TIME FOR **DEFENDANT TRANS UNION LLC** 11 v. TO FILE RESPONSIVE PLEADING 12 TRANS UNION LLC; EQUIFAX (Second Request) INFORMATION SERVICES, LLC; and 13 FREEDOM MORTGAGE CORPORATION. 14 Defendants. 15 Plaintiffs Tiffany and Steven Keith ("Plaintiffs"), by and through undersigned counsel, has 16 conferred with Defendant Trans Union LLC ("Trans Union") through its corporate counsel, and 17 agreed to permit Trans Union an additional seven-day extension of time through March 3, 2022, 18 19 to file its responsive pleading. In support of the request, Plaintiffs state as follows: 20 1. Plaintiffs filed this action on January 12, 2022 (Doc. 1). 21 2. Trans Union was served with the Complaint on January 20, 2022 (Doc. 6). 22 3. Plaintiffs filed a Motion and Order for an Extension of Time for Trans Union LLC to 23 file a responsive pleading through February 24, 2022 (Doc. 13). 24 4. The Court granted Plaintiffs' Motion, thereby extending Trans Union's deadline to file 25 a responsive pleading to February 24, 2022 (Doc. 14). 26 27 28

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- 5. Plaintiff's counsel has been in contact with Trans Union's corporate counsel and both parties are agreeable to an additional seven-day extension through March 3, 2022, for Trans Union to answer or otherwise plead.
- 6. The requested extension will allow Trans Union sufficient time to investigate the matter and determine whether early resolution of this matter is feasible without the need for further litigation.

WHEREFORE, Plaintiff respectfully requests that Defendant Trans Union LLC be granted an extension to answer or otherwise plead through March 3, 2022.

RESPECTFULLY SUBMITTED this 23<sup>rd</sup> day of February 2022,

By: /s/ Steven A. Alpert
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IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

DATED: February 24, 2022